

EXHIBIT 2

SINCLAIR DECL.

**EVANS, et al. v. ARIZONA CARDINALS
3:16-cv0-01030-WHA (N.D. Cal.)**

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
4 CASE NO.: 3:16-CV-01030-WHA

5 ETOPIA EVANS, et al,
6 Plaintiffs,
7 vs.
8 ARIZONA CARDINALS FOOTBALL CLUB,
9 LLC, et al,
10 Defendants.

CONFIDENTIAL VIDEOTAPED DEPOSITION OF
GERALD WUNSCH
Thursday, December 15, 2016
9:30 a.m. - 7:16 p.m.

Robbins, Geller, Rudman & Dowd, LLP
120 East Palmetto Park Road
Boca Raton, Florida

Stenographically Reported By:
Kimberly Fontalvo, RPR, CLR
Realtime Systems Administrator

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1 The following proceedings began at 9:30 a.m.:
2 VIDEOGRAPHER: We're now on the record.

The time is 9:43 a.m. on December 15, 2016.
This is the videotaped deposition of
Gerald Wunsch in the matter of Etopia Evans, et
al., versus Arizona Cardinals Football Club,
LLC, et al.

8 Today's deposition is being held at
9 120 East Palmetto Park Road, Boca Raton,
0 Florida.

1 My name is Stan Perez, the videographer.
2 The court reporter is Kim Fontalvo.

At this time we have an intro from counsel.

15 MR. DAVIDSON: Morning. My name is Stuart
16 Davidson from the Robbins, Geller law firm,
17 here with Janine Arno also from Robbins,
18 Geller. We're representing the plaintiff and
19 the witness today.

20 MR. OLESON: Nathan Oleson of Akin, Gump,
21 Strauss, Hauer & Feld. Also with me is Marla
22 Axelrod, also with Akin, Gump, Strauss, Hauer &
23 Feld, representing the defendants.

24 Thereupon:
25 GERALD WUNSCH

<p style="text-align: right;">113</p> <p>1 practice. 2 Q. But a guy like, say, Warren Sapp, if they 3 wanted him to rest, they would let him rest? 4 A. Yes. So if Warren -- if Warren had -- he 5 would have to have a real legit good injury, right? 6 He would be more likely to be offered rest as an 7 alternative than anybody else. 8 Q. I wanted to go back. You said -- let's 9 just go back to the Baltimore game first. Actually, 10 let's go back to the beginning of Tampa Bay first. 11 A. Okay. I'm sorry I go all over the place. 12 Q. I understand. 13 You had some injuries in Tampa Bay. Do 14 you remember when you first received a medication in 15 Tampa Bay? 16 A. I mean, I can't remember an exact date and 17 what happened. I mean, I know I got muscle relaxers 18 for my neck. I know I got pain meds for certain 19 things. I know -- but, I mean, I'd have to -- I 20 would have to see an actual catalog. I mean my 21 memory is not the best. The further I go back, the 22 better my memory is as far as those type of things. 23 I mean, I can't even remember what I'm taking today. 24 Q. And just so I understand, it's easier for 25 you to remember things further back in your life</p>	<p style="text-align: right;">115</p> <p>1 different cases going on, and you asking a question. 2 It's just like -- 3 Q. Well, let me ask it this way: First, what 4 sort of documents would help you remember what 5 medications -- 6 A. Any medical records that they had that 7 they claim whatever. I mean, there's certain ones 8 that I do remember that were never in drug logs and 9 stuff, like the time with Sam Ramsden on the 10 sidelines, that showed up nowhere. But the reason 11 why I remember it is because he told me, do not sue 12 me personally for this. That's -- I'm going, what 13 are you talking about? Why would I not -- why are 14 you worried about me suing you personally? 15 Q. Did you think at that point that there was 16 something -- he was doing something wrong? 17 A. Yeah. I didn't understand. I mean, Sam, 18 why would you even say that? I mean, he obviously 19 knew something was wrong. I'm like -- and so that 20 was kind of weird to me. 21 Q. Had you taken Vicodin before the time you 22 had in Baltimore? 23 A. I'm sure I have. I just -- I mean, once 24 again, I would have to go through -- I mean, drugs 25 were like -- in the NFL, the drugs were like, I'm</p>
<p style="text-align: right;">114</p> <p>1 than it is -- 2 A. Yes. The more you move up, the more 3 forgetful I get. 4 Q. Okay. So you would remember Tampa Bay 5 better than Seattle? 6 A. I would -- no -- yeah. I mean, the real 7 issues of my problem started, I would say as far as 8 memory goes, would have been 2002 -- when I started 9 playing in the wedge. That was a significant thing 10 where I was starting to have problems sleeping, 11 insomnia, you know, for my ankle because my ankle 12 was so jacked up, I remember they put me on 13 steroids, and I already was not sleeping and already 14 had issues, and I took three of those pills, and I'm 15 like this is -- I'm sleep-deprived now. This isn't 16 doing it. And they were trying to get me to do that 17 in order to practice. 18 Q. So, let me try it this way. Do you 19 remember taking any medications your first year in 20 Tampa? 21 A. I don't remember. I would have to look at 22 documents. Everything in that realm -- we got 23 drugged so much, it's like how could I even compare 24 it to you? I mean, it's like looking through 10,000 25 or 20,000 pieces of paper, and you've got 20</p>	<p style="text-align: right;">116</p> <p>1 hurt and I'm hurting bad. 2 And then they would figure out what they 3 were going to give you. 4 And depending on how bad it was. 5 And, you know, that's -- that was the 6 answer. 7 So, like my ankle. After the fact, years 8 later, the first time I demolished my ankle, I 9 should have went in for surgery to repair the bones. 10 This is talking to doctors that actually give a crap 11 about me now that I learned this. They should have 12 repaired it right then and there. It would have 13 stopped the tearing or at least given me more 14 longevity. But instead they sent -- we did rehab, 15 whatever, didn't repair it, so I could get back as 16 fast as possible to be able to perform that next 17 year. 18 And even when I hurt it in the Green Bay 19 game, once again, they all knew that I tore it more, 20 right, and it was always, we're going to rehab you, 21 we're going to get you back. 22 I sit down with Ted Thompson, I go in his 23 office, Mike Holmgren walks me in, he goes, we're 24 going to have to do a handshake deal. 25 I go, like what?</p>

<p style="text-align: right;">117</p> <p>1 He goes, I need you to meet with Ted 2 Thompson. 3 Okay. So I go sit down with Ted. Ted 4 goes, okay, we're not going to put you on IR. I 5 need you not to fight us. Okay? We're going to let 6 you sit at home, okay? We are going to have our 7 trainers and our strength and conditioning guy and 8 we're going to send you to G2 Sports. 9 You'll see all those documents in there. 10 You're going to sit at home and we're 11 going to take care of you away from the facility. 12 Then when you come back, okay, we're going to make 13 up all your money, which is a complete messed-up 14 deal. 15 So I'm injured, okay. I got somebody who 16 is going to pay and take care of me. So I'm like, 17 all right. So I can't remember what week it was, 18 and their whole thing again was physical therapy, 19 not going in and properly fixing the issue, giving 20 me my time, rehabbing and coming back from a proper 21 surgery. Instead we go down this whole other path. 22 Q. And this is in Seattle? 23 A. Yes. 24 Q. Okay. 25 A. I'm sorry, but I'm trying to show you how</p>	<p style="text-align: right;">119</p> <p>1 that? 2 A. The first one was Sig Hansen when they did 3 my ankle surgery, that should have never been done 4 the way it was done. It was bone on bone. Okay? 5 And Sig is like, you -- they compromised the 6 stability of your ankle long-term to get you to come 7 back to be able to play that football season. And 8 they brought me back at five weeks. He goes, that's 9 absolutely insane. 10 And then I fracture my toe, and that's 11 what they release me on because they can release me 12 on that. That's not my ankle. So they put me on IR 13 for five weeks, okay. 14 And Dr. Auld, I'm sitting in his office 15 the last time I have to go see him, and he says, you 16 know the only way you fractured this toe is because 17 your ankle don't move. He goes, you're about to get 18 a letter, I want you to know, that your career is 19 over with the Seattle Seahawks. 20 I said, thank you for letting me know. I 21 walked out the door. 22 Q. Sig Hansen, is that a doctor in Seattle? 23 A. He is in Seattle, Sigvard Hansen is the 24 one, because I was bone on bone, my ankle was 25 actually locked, it couldn't move. So what they</p>
<p style="text-align: right;">118</p> <p>1 this works. 2 The only thing that matters is whether I 3 got to win that next game, or can I afford 4 Mr. Wunsch to go away because I count on him so 5 much, I can't let him leave, but I have a roster 6 issue. So this is my best plan for having a winning 7 Super Bowl football season. And that's what 8 everything is about. Anything other than that is 9 ignored. 10 Q. And is that the way you understand the 11 game was played when you were meeting with Ted 12 Thompson in Seattle at that point? 13 A. I didn't know it at that point. I 14 actually, this whole time, thought all these people 15 were looking out -- hey, Jerry, we're going to help 16 you out. Patting you on the back. We're going to 17 do this for you. Right? That's what they do. 18 And then when you get away from it, you 19 see the actual insanity of it all. When you start 20 talking to real doctors, and real doctors say, they 21 did what? It's crazy to them. And that's where the 22 reality and the understanding came was way after the 23 fact. 24 Q. So when did you -- you said there's a 25 doctor that told you that that was crazy. Who was</p>	<p style="text-align: right;">120</p> <p>1 would do is tape it and medicate in order for me to 2 play. 3 Q. Just so I'm clear, Dr. Hansen is the one 4 that actually did repair your ankle? 5 A. Yes. So he's the one that came in, and I 6 had to get a tendon transfer from the repeated tears 7 over the years, which should have been repaired day 8 one, should have been rested and healed. 9 And Sigvard looked at it and goes, in 10 order for you to be able to walk again, okay, we're 11 going to have do a thing called a gastroc release, 12 okay. It's basically faking your body into changing 13 your gastroc and your stance so that you're -- I 14 mean, I can move my ankle up and down now. Okay. 15 So without that my ankle would have been more like 16 fused. 17 And he went in there thinking he was just 18 going to repair it, what should have been done 19 originally. It was so destroyed that he had to 20 actually take half my longus and put it into my 21 brevis and make a new brevis. He told me this and 22 he said, if you ever hurt this again, we're going to 23 have to fuse your ankle. I want you to know that. 24 And that's -- he's kind of like the ankle 25 guru in the United States. He's the one that</p>

<p style="text-align: right;">121</p> <p>1 actually invented the gastroc slide.</p> <p>2 Q. So did you have this surgery shortly after</p> <p>3 the end of your career with the Seahawks?</p> <p>4 A. Yeah. And you know what, first time I get</p> <p>5 medical advice, they send me a frigging</p> <p>6 cease-and-desist letter telling me I waive all my</p> <p>7 rights and all this stuff.</p> <p>8 I wanted to go (indicating). First time I</p> <p>9 go to do something for myself so I can frigging walk</p> <p>10 again and you're going to send me a cease-and-desist</p> <p>11 letter? I mean, who the hell are you? And I'm</p> <p>12 suppose -- now I'm starting to realize that this was</p> <p>13 always all about them the whole time and winning</p> <p>14 football games at any expense.</p> <p>15 Q. When you got the cease-and-desist letter?</p> <p>16 A. Yes. I'm trying to get myself healthy.</p> <p>17 At that point in time, you've played football all</p> <p>18 your life and you're still thinking, I'm going to</p> <p>19 show everybody, I'm going to come back from this</p> <p>20 better than ever. You got this delusional -- they</p> <p>21 just reconstructed half my ankle, right, but you're</p> <p>22 still like, I'm going to show these guys.</p> <p>23 And in order for me to do it, I went and</p> <p>24 saw a bunch of doctors to get advice, and everybody</p> <p>25 agreed, see Sig. What's his name in Colorado,</p>	<p style="text-align: right;">123</p> <p>1 And, you know, you're sitting there and</p> <p>2 you're thinking, okay, well, I must need this.</p> <p>3 They're giving it to me, these doctors.</p> <p>4 By the way, they go find who are</p> <p>5 supposedly the best doctors in Seattle, Tampa</p> <p>6 supposedly had the best doctors in Tampa. You're</p> <p>7 seeing and being cared for, in your mind, by the</p> <p>8 best people.</p> <p>9 You go from dealing with Denny Helwig and</p> <p>10 Barry Alvarez, who actually care about your</p> <p>11 long-term health, to a bunch of people who all they</p> <p>12 cared about was winning the next football game. And</p> <p>13 you don't understand the transition.</p> <p>14 All you understand is, hey, you know, if I</p> <p>15 don't do what they want, I could be fired. You</p> <p>16 understand that. That's the high-priced whore part</p> <p>17 of it. Okay? That if -- I'm going to use you how I</p> <p>18 see fit. And if I don't, I'm going to go find</p> <p>19 another whore. Okay? And that is always the</p> <p>20 precedence of what's set. You never realize that</p> <p>21 these guys might be doing and using things that</p> <p>22 could potentially long-term affect your entire life.</p> <p>23 Q. So was there a particular fact that you</p> <p>24 learned in 2014 that you didn't know before?</p> <p>25 A. Well, I had originally talked to my</p>
<p style="text-align: right;">122</p> <p>1 Philippon, go see Sig, go see Sig.</p> <p>2 And I went and saw Sig, Sig give me the</p> <p>3 advice. The Seahawks get wind of it and they send</p> <p>4 me a cease-and-desist letter.</p> <p>5 Q. Dr. Hansen, did you tell him that you were</p> <p>6 taking any medications, the medications that you</p> <p>7 took while you were with the Seahawks?</p> <p>8 A. Oh, I told him what the -- see, at that</p> <p>9 point in time, I don't understand that the</p> <p>10 medication is an issue, okay. No one ever explained</p> <p>11 that medication is an issue. The first time I find</p> <p>12 out that medication is an issue is like 2014,</p> <p>13 somewhere in there. I just thought, hey, you take a</p> <p>14 medication, you need this, doctors give it to you,</p> <p>15 trainers hand it to you, must be what I need. You</p> <p>16 trust them. The doctors took a frigging Hippocratic</p> <p>17 oath. Where does that change as soon as you work</p> <p>18 for a NFL football team?</p> <p>19 Q. And what was the issue, the medication</p> <p>20 issue that you learned about in 2014?</p> <p>21 A. That it could potentially -- well, sparked</p> <p>22 my Crohn's issues. They don't know what causes</p> <p>23 Crohn's, okay, But all those medications ulcerate</p> <p>24 your stomach. Vioxx was taken off the market for</p> <p>25 stomach ulcerations. All these things. Okay?</p>	<p style="text-align: right;">124</p> <p>1 gastrointestinal guy.</p> <p>2 MR. DAVIDSON: And I don't want you</p> <p>3 talking about what you spoke to your doctor</p> <p>4 about because that's privileged as well.</p> <p>5 MR. OLESON: Well, he's got a waiver.</p> <p>6 MR. DAVIDSON: Oh, he's got a waiver.</p> <p>7 That's right.</p> <p>8 You're okay. I'm good with that. Go</p> <p>9 ahead.</p> <p>10 THE WITNESS: What do you mean, a waiver?</p> <p>11 MR. DAVIDSON: In order for -- if you</p> <p>12 don't mind me on the record -- in order to get</p> <p>13 all your medical records from all of your</p> <p>14 doctors --</p> <p>15 THE WITNESS: Oh, yes.</p> <p>16 MR. DAVIDSON: -- you signed a waiver.</p> <p>17 THE WITNESS: Correct.</p> <p>18 MR. DAVIDSON: So this would encompass</p> <p>19 that as well.</p> <p>20 So I apologize for the original objection</p> <p>21 and I withdraw that.</p> <p>22 BY MR. OLESON:</p> <p>23 Q. You talked to your gastro --</p> <p>24 A. Gastroenterologist. Yes. I bring him up</p> <p>25 quite a bit so I know how to say it.</p>

<p style="text-align: right;">125</p> <p>1 Q. So first of all, who is that? 2 A. Dr. David Becker. He was the president of 3 the Florida Gastroenterologist Society, blah, blah, 4 blah.</p> <p>5 Q. And what did he tell you? 6 A. He didn't tell me anything. I asked him, 7 I said, with all these issues, I said, could any of 8 this have been from NSAIDs? Because you start 9 hearing about NSAIDs, Toradol, blah, blah, blah, 10 after I'm done playing.</p> <p>11 And one doctor told me, you shouldn't have 12 Toradol more than five times in your life. And this 13 all starts coming out way post afterwards. And so 14 that's when I start asking questions. And he's 15 like, yeah, definitely. He goes, I mean, you have a 16 super highway. And he started explaining to me how 17 if -- you know, there's people -- there's people 18 maybe even in this room that have Crohn's disease 19 and may never know it and may die and never know it. 20 What happens is there becomes a trigger, 21 something triggers your GI tract to go (indicating). 22 And they've also, along with this, tied it into 23 boxers -- I mean, this is a different issue -- 24 breaking the blood brain barrier, causing -- I mean, 25 there's all kinds of different things around this</p>	<p style="text-align: right;">127</p> <p>1 the Toradol stuff, after I was done playing, they 2 started talking about it in the news, and I just 3 overheard it, so I'm like, you know -- if you've 4 ever -- and you probably have, been part of a news 5 story, usually part of it is truth and part of it is 6 crap. Right? So I, you know, figure I'm going to 7 trust Dr. Becker, who is a doctor and go talk to 8 him.</p> <p>9 Well, after dealing -- after my incidents 10 in trusting NFL doctors, I still have a trust issue 11 now. Between my marriage and my doctors, I have 12 serious trust issues, okay, where I used to trust 13 everybody.</p> <p>14 And so I started asking questions and one 15 person that I really trusted was Dr. Brent Agin, 16 because Dr. Brent Agin is a naturalist. Now, he 17 will and can prescribe medications, but he's an 18 all-natural doctor. That's where I learned about 19 turmeric, that's where I've learned about natural 20 vitamin IVs and all this stuff to try and help me 21 through what I'm going through to tolerate this.</p> <p>22 And then you go to different places and 23 you start -- people ask you questions, and then you 24 start telling them the stories. And these are 25 doctors and their faces and the comments. And then</p>
<p style="text-align: right;">126</p> <p>1 one thing.</p> <p>2 And so the discussion started. Well, you 3 don't -- I don't take someone's just word for 4 something anymore like I used to because I got 5 burned and learned through my own health issues that 6 I know I'll never and no longer do that. In fact, 7 me and my girlfriend, hopefully someday soon to be 8 wife, we sit down and now research and do everything 9 for every medication because of what I've gone 10 through.</p> <p>11 And so he told me that that was definitely 12 something. So then I started talking to other 13 doctors, and then all of a sudden -- and then you 14 start looking at research. Well, Vioxx was taken 15 off the market for ulcerating stomachs and Indocin 16 and blah, blah, blah. And then you start going down 17 this whole path.</p> <p>18 So that's really when I realized that, oh, 19 shit, these guys are -- did I say that, sorry -- 20 that these guys were doing this to get me to play at 21 the just whatever to my long-term health.</p> <p>22 Q. And this was when you started seeing 23 Dr. Becker first?</p> <p>24 A. Dr. Becker was the first person that I 25 talked to that -- and it was just in passing because</p>	<p style="text-align: right;">128</p> <p>1 you go, oh, so this isn't normal?</p> <p>2 Q. So you raised the issue of the medications 3 you took in the NFL with Dr. Brent Agin too?</p> <p>4 MR. DAVIDSON: Objection to form.</p> <p>5 A. Yes, after, down the road, yes. After I 6 talked to Dr. Becker, then I ended up talking to 7 Dr. Brent Agin, I ended up talking to someone, the 8 lead doctor, whoever oversaw whatever at Cleveland 9 Clinic.</p> <p>10 BY MR. OLESON:</p> <p>11 Q. Do you remember when you had the 12 conversation with Dr. Becker?</p> <p>13 A. You know what I learned about the NFL?</p> <p>14 Q. Well, actually --</p> <p>15 A. I'm having a colonoscopy in Cleveland 16 Clinic in Miami, right down here, and I had 17 previously gone to Cleveland Clinic in Cleveland, 18 and the guy with the little NFL badge meets me at 19 the door. Meanwhile, he works for Cleveland Clinic.</p> <p>20 My girlfriend freaks out. We don't have 21 access to any of my medical records for two days 22 we're there. Finally my girlfriend walks in, pulls 23 me out of my doctors and says, we are not doing 24 another thing until we get access to our medical 25 records.</p>

<p style="text-align: right;">129</p> <p>1 The NFL guy is, oh, I'm right on it, I'm 2 right on it. Okay?</p> <p>3 So, I, myself, and my girlfriend make an 4 appointment for Cleveland Clinic in Miami down here 5 to go see a gastroenterologist. It's the only thing 6 my insurance will cover.</p> <p>7 I go down there, I walk in the door, and 8 here is another guy with an NFL pin waiting for me 9 at the door. I made this appointment. What are you 10 doing here?</p> <p>11 I'm just here to help you through the 12 process.</p> <p>13 Really? Okay. So I'm down there for a 14 bunch of days. I end up doing all kinds of testing, 15 and then they decide they want to do a colonoscopy.</p> <p>16 So this guy that works for the Cleveland 17 Clinic, works for the NFL, does the spotting, okay. 18 I wake up from my colonoscopy. My girlfriend ain't 19 standing next to me, okay, the guy from the NFL is 20 standing next to my doctor, is standing next to me 21 in a private area, okay. Talk about HIPAA 22 violation, but it might not be because the guy works 23 for the Cleveland Clinic and the NFL.</p> <p>24 Q. I'm just trying to figure out, though, 25 where Dr. Becker fits in this.</p>	<p style="text-align: right;">131</p> <p>1 but right now I need to take everything down to the 2 basics. You're going to eat rice and you're going 3 to take the meds I give you and nothing else.</p> <p>4 So I go through that process. Well, it 5 kind of works for a little period of time and then 6 it gets really bad again.</p> <p>7 Q. When would that have been?</p> <p>8 A. I can't remember. I have to see the 9 actual --</p> <p>10 Q. But like within six months?</p> <p>11 A. Six months to a year. I can't remember 12 exactly.</p> <p>13 Q. Okay.</p> <p>14 A. I would say six months to a year.</p> <p>15 So I walk in and I tell him, I can't live 16 like this. I don't care if it's frigging battery 17 acid you have to give me to give me a good year 18 where I feel at least somewhat decent. I go, this 19 sucks. I can't live like this.</p> <p>20 And he goes, well, we have some other 21 options. We have biologics. He goes, have you 22 looked at biologics?</p> <p>23 I'm like, no, I don't even know what a 24 biologic is.</p> <p>25 He goes, well, it's a chemotherapy</p>
<p style="text-align: right;">130</p> <p>1 A. Well, so with all that, he said also, I 2 think you might have some other issues also related 3 to that. He goes, I would like to check more into 4 it.</p> <p>5 That's where the final stamp of, okay, 6 I've gone and saw all these people, okay, everybody 7 is saying the same damn thing, okay, this is 8 frigging real. And that's the final straw. And 9 that's when I'm like, okay, said, done, whatever. 10 And that's where the whole process of going through 11 this is where I knew for the first time what had 12 gone on.</p> <p>13 Q. But Dr. Becker, had you seen him before 14 the Cleveland Clinic?</p> <p>15 A. Yes. The first time I saw Dr. Becker, I 16 was bleeding profusely to the point where they sent 17 me to the hospital. I saw him in 2009 the first 18 time. The first time I went and saw him, he told me 19 to get off all medication, and you need to start 20 eating rice. I'm putting you on this medication. 21 This will hopefully help you with your joints, okay, 22 and this will help you with everything else, okay. 23 Asacol. He had a little regimen. He goes, stop 24 taking everything else. He goes, if you've got to 25 go see another doctor, we'll figure this out later,</p>	<p style="text-align: right;">132</p> <p>1 treatment. He goes, it will definitely help your 2 joints. It will help with your inflammation. It 3 will help with all that and it should help your 4 stomach.</p> <p>5 Well, I went through that and went through 6 a very quick regimen of it. To get you to 7 understand, each one of those is \$24,000 every time 8 you sit down for one of those. So I went through 9 Remicade.</p> <p>10 Then after Remicade, I went to a round of 11 Humira because I ended up in the hospital and 12 Remicade wasn't working anymore. I was in the 13 hospital for five days.</p> <p>14 So the rheumatologist decided to also put 15 me on Humira. Now, whenever that time was, was the 16 time right in there, when after I got out of the 17 hospital that I started talking to Dr. Becker about, 18 hey, could this -- that was the conversation, one of 19 those follow-ups from out of the hospital, could 20 this have been one of the issues? And I want to say 21 it was about 2014.</p> <p>22 Q. And the conversation was, could what I 23 have right now be caused by the medications from the 24 NFL?</p> <p>25 A. Yes.</p>

<p style="text-align: right;">145</p> <p>1 coach in Tampa?</p> <p>2 A. No, Seattle. When I got to Seattle.</p> <p>3 The one in Tampa, I played at 340 my whole</p> <p>4 career. I played at 335, 340 in my senior year in</p> <p>5 college.</p> <p>6 Q. Did anybody in Tampa besides Coach Gruden</p> <p>7 have a problem with you being at that weight?</p> <p>8 MR. DAVIDSON: Objection to form.</p> <p>9 A. No, they were good with it.</p> <p>10 BY MR. OLESON:</p> <p>11 Q. The agents that you had, how often would</p> <p>12 you communicate with them?</p> <p>13 A. Depending. I mean, it would go a period</p> <p>14 of time. They would call and check in. It's</p> <p>15 more -- it was mostly about how are things going, do</p> <p>16 you like it? I really wouldn't hear from them until</p> <p>17 it was usually about contract time, when they knew</p> <p>18 it was time to get paid again.</p> <p>19 They would help you do some different</p> <p>20 things like set up -- like I faked the Buccaneers</p> <p>21 one year, the Bengals flew me out to make them think</p> <p>22 that I was going to sign there.</p> <p>23 Q. Did they ever inquire about your health?</p> <p>24 A. Did they, no. They couldn't override what</p> <p>25 the teams did anyway. The contracts were with the</p>	<p style="text-align: right;">147</p> <p>1 And the biggest issue was, overall, was</p> <p>2 the doctors we had were supposed to be the best of</p> <p>3 the best, and at no time, other than my weight issue</p> <p>4 because I didn't think I was going to make it, did I</p> <p>5 feel that they had anything but my best interest and</p> <p>6 my long-term health in their minds. They took a</p> <p>7 Hippocratic oath.</p> <p>8 I thought I was in a similar situation as</p> <p>9 I was dealing with Barry Alvarez and Denny Helwig.</p> <p>10 The positions of that situation, head coach,</p> <p>11 trainers, doctors, were the same, they were supposed</p> <p>12 to take care of us. They were supposed to look out</p> <p>13 for us. And you wouldn't think that anyone would be</p> <p>14 put in a situation or would volunteer a situation</p> <p>15 that they would knowingly or possibly hurt somebody</p> <p>16 to keep their job.</p> <p>17 BY MR. OLESON:</p> <p>18 Q. Who else tried to get a second opinion and</p> <p>19 had a problem that you are aware of?</p> <p>20 A. One time Anthony Simmons flew out for one,</p> <p>21 and I remember he came back and he's like, that was</p> <p>22 a waste of time.</p> <p>23 Q. Did he tell you why?</p> <p>24 A. The team doctors didn't agree. So if the</p> <p>25 team doctors don't agree, your second opinion</p>
<p style="text-align: right;">146</p> <p>1 team. So the only time that I had a situation</p> <p>2 where -- that the weight issue, which is -- and I</p> <p>3 called them because I didn't even know if it was</p> <p>4 wrong or what, I just -- I was scared I wasn't going</p> <p>5 to be able to do it. I'm like, what do I do? And</p> <p>6 that was the phone call.</p> <p>7 Anything else, I didn't know or understand</p> <p>8 was an issue or a problem.</p> <p>9 Q. While you were in the NFL, it was -- your</p> <p>10 relationship with the team was subject to a</p> <p>11 collective bargaining agreement; is that correct?</p> <p>12 MR. DAVIDSON: Objection to form.</p> <p>13 A. There's a collective bargaining agreement,</p> <p>14 correct.</p> <p>15 BY MR. OLESON:</p> <p>16 Q. Did you know, under the collective</p> <p>17 bargaining agreement, that you had a right to a</p> <p>18 second opinion from a doctor?</p> <p>19 MR. DAVIDSON: Objection to form. You can</p> <p>20 answer the question though.</p> <p>21 A. Yes. Sig Hansen was a second opinion, and</p> <p>22 I got a cease and desist. Everybody that went to</p> <p>23 get a second opinion, okay, there was always issues</p> <p>24 with it. There was actually to the point where</p> <p>25 everybody was scared to go get one.</p>	<p style="text-align: right;">148</p> <p>1 doesn't mean anything.</p> <p>2 So you go -- they flew me down for my</p> <p>3 fractured toe when my actual ankle was destroyed</p> <p>4 when I tried to fight them, and I'm trying to</p> <p>5 explain to them, this isn't about my toe, this is</p> <p>6 about my ankle. My ankle is done. Right?</p> <p>7 And the guy goes, I'm not here to talk</p> <p>8 about your ankle, I'm here to talk about your toe.</p> <p>9 I'm like, well, I didn't come here as a</p> <p>10 second opinion for a fractured toe. I said, any</p> <p>11 jackass off the street could tell me that. A</p> <p>12 fractured toe takes six to eight weeks. A broken</p> <p>13 bone, a fractured bone is six to eight weeks. Now,</p> <p>14 please, while we're sitting here, tell me what's</p> <p>15 going on with my ankle.</p> <p>16 Q. Is this with Dr. Hansen?</p> <p>17 A. No. They fly me down to Charlotte, North</p> <p>18 Carolina. I can't remember the guy's name. He's</p> <p>19 like, Jerry, my hands are tied.</p> <p>20 And then I ended up going to Philippon in</p> <p>21 Denver again for another thing. He says the same</p> <p>22 thing. I'm not here to evaluate your ankle, da, da,</p> <p>23 da, da, da.</p> <p>24 I'm like, well, then what am I doing here?</p> <p>25 Q. Did you file a grievance over that issue</p>

<p style="text-align: right;">189</p> <p>1 Q. And again, for context, that was when Tony 2 Dungy kept making the championship game and couldn't 3 get to the Super Bowl?</p> <p>4 A. We didn't make the championship game every 5 year, but we would make the playoffs.</p> <p>6 Q. So just so I'm clear, you don't have any 7 reason to believe that the Bucs' doctors that gave 8 you medications at Tampa Bay were trying to hurt 9 you?</p> <p>10 A. I don't believe they even considered the 11 long-term possible health. I think they considered 12 what needed to be -- what needed to be done for 13 Sunday.</p> <p>14 Q. What about the trainers in Tampa, do you 15 believe that they had any intent to try to hurt you 16 when they gave you --</p> <p>17 A. I don't think -- same situation. I think 18 it's about -- it all comes down from the pressure. 19 Just like you being here today. If you decided not 20 to get on the plane to be here and they told you to 21 be here, okay, you're going to get fired. And it's 22 all on what they're doing, okay, and how they do 23 their thing.</p> <p>24 And if you know -- I mean, Sam Ramsden 25 grew up and started with the Green Bay Packers</p>	<p style="text-align: right;">191</p> <p>1 buddy, and hey, everybody is, yes, this is awesome, 2 and then all of a sudden your key card doesn't work, 3 you still have medical problems, you still have 4 medical issues, you're trying to call, you're trying 5 to get all this stuff, and no one answers your phone 6 call.</p> <p>7 So what happens is you have no idea, okay, 8 of anything. And I did not realize anything until 9 so far after the fact when I started realizing that, 10 you know, that I -- my issues started just really 11 compounding and going. And then I met an 12 attorney --</p> <p>13 Q. Don't talk about --</p> <p>14 MR. DAVIDSON: He's not going to talk 15 about what they spoke about.</p> <p>16 A. I met an attorney, okay, and -- how do I 17 go about this? Who looked at my case as far as from 18 a workers' comp claim case, and then said -- how do 19 I do this?</p> <p>20 BY MR. OLESON:</p> <p>21 Q. Let's go back to my question because 22 you've strayed a little bit from it.</p> <p>23 Sitting here today, based on all that you 24 know now, from your workers' comp case, this 25 lawsuit, everything else, do you believe that the</p>
<p style="text-align: right;">190</p> <p>1 working for Holmgren. He's never seen anything 2 else. So he may think what's going on there is 3 normal.</p> <p>4 MR. DAVIDSON: Can we take a break at some 5 point because we've been going for a while.</p> <p>6 MR. OLESON: Sure. Just a few more 7 minutes, okay?</p> <p>8 THE WITNESS: Yeah, that's fine.</p> <p>9 BY MR. OLESON:</p> <p>10 Q. And with respect -- you said Sam Ramsden 11 did some things wrong. What were those things?</p> <p>12 A. Well, one -- I mean, obviously, you know, 13 allowing -- being part of allowing my ankle to 14 continually tear and not in my best interest to go 15 get it fixed, get the time to let it heal, for me 16 personally, that's one of the issues that I had that 17 is a problem. I mean, it could have been fixed. 18 The time could have been set aside for me to have my 19 long-term health in consideration.</p> <p>20 Q. The team doctors in Seattle, did you think 21 any of them were trying to hurt you by giving you 22 medications?</p> <p>23 A. No. I mean, I thought everybody there -- 24 we were all a team. It was everybody -- see, what's 25 funny is we're all a team and we're all buddy,</p>	<p style="text-align: right;">192</p> <p>1 Seattle Seahawk doctors were trying to harm you when 2 they gave you medications in the NFL?</p> <p>3 A. Intentionally going I'm trying to do that 4 to you, no. I think they were trying to get me out 5 on the field to benefit the overall football team to 6 win a football game to make money so people are in 7 the stands.</p> <p>8 Do I think that they said -- because if 9 they did do that, what's the difference between 10 putting a gun to my head and shooting me then and 11 slowly killing me over time? It's murder.</p> <p>12 So I would hope that for the people that I 13 think they are away from their profession that hell 14 no, they wouldn't do it.</p> <p>15 Q. So you have no reason to believe sitting 16 here today that they were trying to hurt you, the 17 Seattle Seahawks?</p> <p>18 A. They did hurt me. I don't think they took 19 my long-term health into consideration at all. Do I 20 think they intentionally hurt me? I think they 21 could have made a lot better decisions with ankle -- 22 especially towards the end of my career when I was 23 having all these random flu things and didn't even 24 check into it and all that kind of stuff. But did 25 they give me cyanide? No.</p>

<p style="text-align: right;">217</p> <p>1 was even playing. I mean, those last two or three 2 years, I just didn't realize. It was just kind 3 of -- until I got it so bad with the ears and 4 couldn't leave the house for three months. That was 5 when I really realized, okay, this is an issue.</p> <p>6 Q. The peripheral nerve issue, when were you 7 diagnosed with that?</p> <p>8 A. I saw Dr. Russman, the neurologist, and 9 some people had called it fibromyalgia, early. 10 That's when I got put on the Lyrica and stuff. And 11 that's really when I started understanding that it 12 was more than fibromyalgia. Especially when I would 13 do the sit-down -- what he found was when I stand 14 up, sit down, lay down, my heart rates are 15 completely different, and that relates to 16 peripheral -- your heart and your brain and all that 17 not working right in peripheral nerves.</p> <p>18 Q. Has Dr. Russman given you any --</p> <p>19 A. Oh, and I also saw a nerve specialist in 20 Cleveland Clinic down here in Miami, and he actually 21 tested my nerves, and there were issues with them.</p> <p>22 Q. Did they -- either Dr. Russman or that 23 nurse identify any cause for the peripheral nerve 24 vision?</p> <p>25 A. Well, he starts in your head. So the</p>	<p style="text-align: right;">219</p> <p>1 check somebody. And that was just me standing at an 2 event. So my next move is to go see what that all 3 entails.</p> <p>4 Q. And who was the player that told you about 5 that vein issue?</p> <p>6 A. I got his name. I just met him. He had 7 to -- think they call it a vein stripping from the 8 damage from being rolled up on. He said he was in 9 the shower, and his veins looked a lot like mine in 10 my lower leg, and they just started popping pinholes 11 in them and just started squirting blood. And he 12 goes, you may want to go get that checked out.</p> <p>13 Q. The vertebrae on your spinal cord, what is 14 that condition?</p> <p>15 A. I don't know that it's a condition, but my 16 vertebrae are on my spinal cord. Dr. Joseph in 17 Tampa recommended to try the nerve stim stuff and 18 whatever. But he is going to eventually, once I 19 can't do it anymore, go in there and do surgery with 20 that. And my neck fusion that I need.</p> <p>21 Q. When was the first time you consulted with 22 Dr. Joseph about the vertigo?</p> <p>23 A. I was referred to him by Dr. Watson in 24 Tampa because Dr. Watson is an orthopedic, not a 25 spine surgeon. And then -- that would have been</p>
<p style="text-align: right;">218</p> <p>1 whole peripheral nerve stuff starts in your head and 2 then works down.</p> <p>3 I also -- you know, one scan said I had a 4 gray matter issue, which could be an issue with that 5 also. So you just keep digging, trying to find what 6 the cause. And even Dr. Russman said you just have 7 a plethora of issues.</p> <p>8 Q. How long have you had symptoms for the 9 peripheral nerve condition?</p> <p>10 A. I had that when I was still playing. I 11 had shooting nerve pain. I had the issues in my 12 arms going down into my fingers, into my thumbs. 13 I've had that for quite a long period of time.</p> <p>14 After the damages of my ankle -- actually, 15 I might have a new diagnosis. I have got to go see 16 a doctor for it. I can't feel from my mid calf 17 down.</p> <p>18 I've been rolled up five times on my left 19 side and I can't remember how many on my right. But 20 it's damaged all those nerves down there. And I 21 actually ran into a guy who played two years in the 22 league, and he actually had to get his veins redone 23 because his veins were exploding and actually 24 spraying blood on walls. And he goes, your ankles 25 look like me. So he goes, you might want to go</p>	<p style="text-align: right;">220</p> <p>1 2014 or '15.</p> <p>2 Q. How long have you had symptoms related to 3 your vertebrae?</p> <p>4 A. Oh, going all the way back to Tampa Bay. 5 I was getting scans and all that in my neck in 6 Tampa.</p> <p>7 Q. The pituitary issue, what is that?</p> <p>8 A. My pituitary gland isn't working properly. 9 And that goes along with the endocrine stuff. I 10 have to take 1.5 cc of testosterone. I was 11 originally last year on 1 cc; that, no longer works. 12 I was doing it once a week. Now I take 1.5 every 13 five days.</p> <p>14 I also was put on an estrogen blocker 15 for -- their finding was CTE, it's not official yet, 16 but these issues.</p> <p>17 Q. Has anybody told you that the pituitary 18 issue is related to anything that happened to you in 19 the NFL?</p> <p>20 A. Yeah, they believe so, yes. But how do 21 you -- unless you did a scan before and after 22 immediately. I mean, I've never had any other 23 issues or things that would cause me to think it 24 came from anywhere else.</p> <p>25 Q. Who has told you that they think it's</p>

<p style="text-align: center;">221</p> <p>1 related to that time?</p> <p>2 A. Dr. Brent Agin; Dr. Spiegel; Dr. Russman.</p> <p>3 Q. When did you first learn about the</p> <p>4 pituitary issue?</p> <p>5 A. I was having issues, saw Dr. Brent Agin.</p> <p>6 I was still married at the time. I didn't know what</p> <p>7 was going on, went to see him. He did some blood</p> <p>8 work and noticed my testosterone was crazy low.</p> <p>9 Q. So was this while you were still -- I</p> <p>10 won't say happily married, but still married and not</p> <p>11 divorcing or --</p> <p>12 A. I would say it was probably 2012.</p> <p>13 Q. And the symptoms related to the pituitary</p> <p>14 condition, how long have you had those?</p> <p>15 A. I don't know for sure 100 percent. I</p> <p>16 mean, that could go way back. I mean, I know I was</p> <p>17 my last three years, so I was dealing with a lot of</p> <p>18 joint and whatever pain. I was also dealing with</p> <p>19 issues with energy.</p> <p>20 Q. Any other injuries that you currently have</p> <p>21 that you don't think you provided or included in</p> <p>22 this application for Bert Bell in Exhibit 1?</p> <p>23 A. Every issue that I have is, except for</p> <p>24 this new vein thing, has been put into 10,000</p> <p>25 documents that I provided to you guys, to the</p>	<p style="text-align: center;">223</p> <p>1 which the NFL then gave me the total and permanent</p> <p>2 disability from it.</p> <p>3 Q. And so how much are you receiving today</p> <p>4 from the NFL for disability benefits?</p> <p>5 A. For the concussion or everything?</p> <p>6 Q. Everything.</p> <p>7 A. I get \$10,000 a month pretax.</p> <p>8 Q. And how long will that benefit continue?</p> <p>9 A. Until I die.</p> <p>10 Q. Did you also file an application for</p> <p>11 Social Security disability?</p> <p>12 A. Yes.</p> <p>13 Q. Do you receive benefits for that?</p> <p>14 A. Yes. I get \$2,000 a month.</p> <p>15 Q. I'm going to introduce what will be</p> <p>16 Exhibit 2 to your deposition and ask that you review</p> <p>17 this document and let me know when you've had a</p> <p>18 chance to do so.</p> <p>19 (Thereupon, marked as Wunsch Exhibit 2.)</p> <p>20 BY MR. OLESON:</p> <p>21 Q. Do you recognize Exhibit 2?</p> <p>22 A. I don't recognize this front part with all</p> <p>23 this -- like this part.</p> <p>24 MR. DAVIDSON: What part are you referring</p> <p>25 to?</p>
<p style="text-align: center;">222</p> <p>1 workers' comp people, to everybody. So whatever --</p> <p>2 it's all there. So everything was put in and given</p> <p>3 over. So you should have it.</p> <p>4 Q. And just sitting here today, you can't</p> <p>5 think of anything specific beyond what you just told</p> <p>6 me that you have that wouldn't have been included in</p> <p>7 this Bert Bell application?</p> <p>8 A. I mean, there might be. There's been so</p> <p>9 much going on with my health and what I'm having to</p> <p>10 do.</p> <p>11 We still haven't gotten to the bottom of</p> <p>12 the stuff with Brent Agin. So there's so many</p> <p>13 things. I mean, you start looking at breaking the</p> <p>14 blood brain barrier stuff and autoimmune issues and</p> <p>15 things like that. So do I have a total diagnosis?</p> <p>16 No. But everybody agrees it's multiple.</p> <p>17 Q. Did you ultimately end up receiving</p> <p>18 benefits from the Bert Bell/Pete Rozelle NFL Player</p> <p>19 Retirement Plan?</p> <p>20 A. I got like \$4,000 a month.</p> <p>21 And then -- oh. So there is something</p> <p>22 that's not in here. This is the oldest form, the</p> <p>23 first time I had filed.</p> <p>24 Then was another one with the concussion</p> <p>25 one and all the concussion issues and brain issues,</p>	<p style="text-align: center;">224</p> <p>1 BY MR. OLESON:</p> <p>2 Q. There's page numbers, what we call Bates</p> <p>3 number at the bottom right corner. If you could use</p> <p>4 those.</p> <p>5 A. I mean, these first pages, I don't</p> <p>6 recognize this, but I obviously signed it because</p> <p>7 that's my signature.</p> <p>8 Q. So just so --</p> <p>9 A. But I don't -- I mean, sitting here right</p> <p>10 now, this does not ring a bell.</p> <p>11 Q. The first page says: "State of</p> <p>12 California, Division of Workers' Compensation,</p> <p>13 Workers' Compensation Appeals Board, Application for</p> <p>14 Adjudication of Claim."</p> <p>15 Do you see that?</p> <p>16 A. Yes. I think they -- I gave them</p> <p>17 basically what was going on, and then they sent it</p> <p>18 back over to me to sign.</p> <p>19 Q. And you say what was going on, that was</p> <p>20 your injuries at the time you submitted this?</p> <p>21 A. Yeah, they wanted me to be --</p> <p>22 MR. DAVIDSON: Not what they told you.</p> <p>23 These are your lawyers you're talking about.</p> <p>24 THE WITNESS: These are all my lawyers.</p> <p>25 MR. DAVIDSON: So I don't want you</p>

<p style="text-align: right;">233</p> <p>1 bill, I don't have \$30,000 to get my hip fixed. I 2 don't have the \$30,000 to get my neck fixed. 3 BY MR. OLESON: 4 Q. So taking your hip as an example, do you 5 think -- do you believe personally, I know you're 6 not a doctor, but do you believe that your hip 7 injury is what it is today as a side effect of any 8 medication you took or because you took medication? 9 A. Because I -- 10 MR. DAVIDSON: Let me just put an 11 objection on the record. I'm going to object 12 as to the form. 13 MR. OLESON: Let me just finish the 14 question, too. 15 BY MR. OLESON: 16 Q. So I'll start again. Taking your hip as 17 an example, do you believe personally, and I know 18 you are not a doctor, but do you believe your hip 19 condition today is caused at least in part by 20 medications because of a side effect from those 21 medications or because you played games and hurt 22 that hip more with the medications? 23 MR. DAVIDSON: Now I'm going to object, 24 Mr. Wunsch is neither a doctor nor is he an 25 expert on causation. He can answer the</p>	<p style="text-align: right;">235</p> <p>1 it's not just one area, it's from the tip of my 2 tongue to my butthole, okay. So it's not just one 3 thing, it's the whole thing. 4 BY MR. OLESON: 5 Q. Are you talking about the Crohn's disease? 6 A. Well, I got Crohn's, diverticulitis, I've 7 got GERD, I've got -- it's the whole GI tract. 8 Crohn's is what everybody talks about 9 because the Crohn's is something that people 10 understand is debilitating. So when you are filing 11 for a disability, people understand Crohn's is a 12 disability. People don't understand that all the 13 rest of my GI tract is screwed up. I got celiac. I 14 got a bunch of -- I mean, there's a whole bunch -- I 15 got gastritis. I got all kinds of different stuff 16 in my GI tract. 17 So what people understand as a disability 18 is the Crohn's. So you write the Crohn's down and 19 then people go, okay, well, I'll pay attention to 20 that. Right? 21 If I put, I got gastritis -- if I put 22 everything else down there besides Crohn's, no one 23 is paying attention to me. Right? They're not 24 taking me seriously. 25 So as far as do I believe those meds</p>
<p style="text-align: right;">234</p> <p>1 question, but the objection stands. 2 A. The hip was made worse by losing the 3 guarding of the ability to feel the pain and take 4 the pain away. I would have better understood what 5 I was dealing with had it not been masked through 6 pain meds and NSAIDs and whatever else. Now, did my 7 hip tear because I took a pill? No. 8 Q. Again, using the hip injury as a -- well, 9 strike that. 10 Let me ask this question first: Are there 11 any conditions that you have -- and again, I know 12 you're not a doctor -- but are there any conditions 13 you have today that you believe are a side effect of 14 the medications that you took in the NFL? 15 MR. DAVIDSON: Objection. Again, same 16 objection. He's not a doctor, he's not an 17 expert. But you can give your lay opinion if 18 you want. 19 A. So had I not had the medications that I 20 had, I probably -- well, I wouldn't have been out 21 there because the pain would have shut me down. 22 As far as the -- my internal issues, after 23 doing tons of research and talking to other doctors 24 after the fact, I do believe that the drugs probably 25 ignited my stomach and -- I mean, it's not just --</p>	<p style="text-align: right;">236</p> <p>1 exacerbated or, after talking to doctors, or may 2 have triggered the response that would have ignited 3 Crohn's, it is a great possibility that that would 4 be true, and I do believe it did. 5 Q. And the doctors that you talked to about 6 that connection started with Dr. Becker? 7 A. Correct. 8 Q. And you don't remember precisely when you 9 had those conversations with Dr. Becker? 10 A. It would have been 2014-ish. 11 Q. And why do you say that? 12 A. Because it was after I got out of the 13 hospital for -- I was in so much pain, okay, and 14 they started doing scans and all this stuff, and 15 they couldn't figure out what was going on with me. 16 I was in the hospital for five days. They were 17 going to rush me in for emergency surgery. 18 Q. What hospital were you in? 19 A. Morton Plant. 20 Q. And you had been under Dr. Becker's care 21 since 2009; is that correct? 22 A. Correct. 23 Q. Had you told Dr. Becker prior to that 24 hospitalization that you had taken medications in 25 the NFL?</p>

<p style="text-align: right;">313</p> <p>1 probably one of the longer ones you've had in while. 2 So I'm going to -- 3 A. It's the longest one I've ever had. 4 Oh, I'm so sorry. I'm just so busy 5 rocking the pain away. 6 Q. So I'm going to try and be quick. 7 A. Yes, please. 8 Q. I will. 9 You had testified just moments ago, 10 Mr. Oleson had asked you whether you believed 11 medications allowed you to play longer in the NFL. 12 Do you remember that question? 13 A. Yes. 14 Q. And do you remember what your answer was? 15 A. I do not at this time. Everything's 16 come -- can you refresh my memory what I said, 17 somebody? 18 Q. I think the record will say what it says, 19 but my recollection is that you testified that 20 medications did allow you to play longer in the NFL. 21 A. Yes. So without them I wouldn't have been 22 able to because the -- without the medications, 23 you -- the pain stops you, guards you, and that's -- 24 everybody knows that's ever injured anything. In 25 order to get rid of that pain, the medications allow</p>	<p style="text-align: right;">315</p> <p>1 provided you all the information you believe you 2 were -- you should have been given regarding the 3 medications that they were giving you? 4 MR. OLESON: Object to form. 5 A. Well, not only that, they should have told 6 me that, but they should have also through all their 7 expertise and years of doing this stuff talked to me 8 about what goes on when you did do this. It was 9 never brought up. They never talked about, hey, if 10 you do this, this is what is going to happen and, 11 you know, those are the issues. 12 BY MR. DAVIDSON: 13 Q. So, when Mr. Oleson showed you Exhibit 5 14 to your deposition where Dr. Shoup writes that the 15 risks of GI bleeding and renal disease were 16 explained and accepted, is that true or false? 17 MR. OLESON: Object to the form. 18 A. I didn't accept anything. 19 BY MR. DAVIDSON: 20 Q. Were you ever explained that taking 21 Toradol would risk you having GI bleeding and renal 22 disease? 23 MR. OLESON: Object to the form. 24 A. No. No, it was not. 25</p>
<p style="text-align: right;">314</p> <p>1 you to do it. 2 Q. Do you believe that had you been allowed 3 to heal properly when you were originally injured 4 that you would have even had a longer career? 5 MR. OLESON: Object to form. 6 A. Oh, yes, 100 percent. 7 BY MR. DAVIDSON: 8 Q. Why do you believe that? 9 A. Well, one, I had to deal with Holmgren, as 10 long as I stayed healthy, I had a job with him, and 11 I couldn't stay healthy because the wheels literally 12 fell off the bus. 13 Q. Now, you had testified earlier that you 14 did not believe that the doctors and the trainers at 15 the Seahawks and the Buccaneers had lied to you. 16 A. Right. 17 Q. Do you remember that? 18 A. Yes. 19 Q. You also testified, however, that, well, 20 they didn't tell you anything, so how could they lie 21 to you, right? 22 A. Right. So how -- well, that's not a lie 23 if you don't tell somebody something. 24 Q. Do you believe that the doctors and 25 trainers at the two teams that you played for</p>	<p style="text-align: right;">316</p> <p>1 BY MR. DAVIDSON: 2 Q. Let me ask you this question. Do you know 3 approximately what year you were pooping blood 4 constantly, as you testified to? 5 A. Yes. It would have been either my second 6 or third year with the Tampa Bay Buccaneers, which 7 would have been '98, '99. 8 Q. So it was before you were with the 9 Seahawks? 10 A. Yes, 100 percent. I was told it's 11 hemorrhoids, get back in. 12 Q. Was that -- so who told you that? 13 A. Todd Toriscelli, the head trainer for the 14 Tampa Bay Buccaneers. 15 Q. So did Todd Toriscelli lie to you when he 16 told you it was hemorrhoids? 17 MR. OLESON: Object to the form. 18 A. I don't know that he lied to me. I don't 19 know that he even knew. I don't know that it was a 20 lie. I guess it was lie. Yeah, it is a lie. I 21 mean, he didn't know. He didn't have the 22 information to make that decision. 23 BY MR. DAVIDSON: 24 Q. So if you -- 25 A. So yeah, it is a lie.</p>

<p style="text-align: right;">317</p> <p>1 Q. I'm sorry. 2 So if in the late '90s you had been 3 pooping blood -- 4 A. Yes. 5 Q. -- if in the early 2000s, a doctor told 6 you that by taking a drug, Toradol, that you would 7 have gastrointestinal bleeding, would you have taken 8 that drug? 9 MR. OLESON: Object to the form. 10 A. No, because I already had gone down that 11 road and down that path and was dealing with those 12 issues. 13 BY MR. DAVIDSON: 14 Q. Did any doctor or trainer of the Seahawks 15 or Buccaneers ever explain to you the side effects 16 of any of the medications that you were taking? 17 MR. OLESON: Object to the form. 18 A. No. 19 BY MR. DAVIDSON: 20 Q. Did any of the doctors or trainers for the 21 Seahawks or Bucs ever explain to you the long-term 22 effects of taking the medications that you were 23 given? 24 MR. OLESON: Object to the form. 25 A. No. It was about them winning football</p>	<p style="text-align: right;">319</p> <p>1 A. Numerous times. 2 BY MR. DAVIDSON: 3 Q. By whom? 4 A. By the trainers. 5 Q. And were those hotel rooms at away game 6 locations? 7 MR. OLESON: Object to the form. 8 A. Away and home games. 9 BY MR. DAVIDSON: 10 Q. Did you know that it was illegal to do 11 that? 12 MR. OLESON: Object to the form. 13 A. I had no idea. Just like before, I 14 trusted that we were doing everything the way it was 15 supposed to be done. 16 BY MR. DAVIDSON: 17 Q. Because you didn't believe that the 18 doctors and trainers were looking out for anything 19 other than your best interest? 20 MR. OLESON: Object to the form. 21 A. I believed that the Hippocratic oath 22 stood, and that's why I always believed that they 23 would protect -- that the protection of the 24 long-term health and the health of the player was 25 always first.</p>
<p style="text-align: right;">318</p> <p>1 games, making money. The long-term effect of what 2 it would do to me financially, physically, all of it 3 was disregarded as far as myself. 4 BY MR. DAVIDSON: 5 Q. And at the time that -- and you testified 6 you were given medications on airplanes; is that 7 correct? 8 A. Correct. 9 MR. OLESON: Object to the form. 10 BY MR. DAVIDSON: 11 Q. Would that have been prescription 12 medications sometimes? 13 MR. OLESON: Object to the form. 14 A. Yes. 15 BY MR. DAVIDSON: 16 Q. Was Ambien ever one of those? 17 MR. OLESON: Object to the form. 18 A. On a plane? 19 BY MR. DAVIDSON: 20 Q. Yes. 21 A. No, I never received Ambien on a plane. 22 Q. Did you ever receive Ambien in a hotel 23 room? 24 A. Yes, I did. 25 MR. OLESON: Object to the form.</p>	<p style="text-align: right;">320</p> <p>1 BY MR. DAVIDSON: 2 Q. Were you ever taking multiple different 3 drugs given to you by team doctors or trainers? 4 A. At times, yes. 5 MR. OLESON: Object to the form. 6 A. You would have Indocin, you would have 7 Toradol, you would have -- there were times where 8 you would have a bunch of it put together. 9 BY MR. DAVIDSON: 10 Q. Were you ever explained at any point in 11 time what the effects of mixing those drugs would 12 be? 13 A. No. 14 MR. OLESON: Object to the form. 15 BY MR. DAVIDSON: 16 Q. When you traveled to away games, who had 17 the drugs? 18 MR. OLESON: Object to the form. 19 A. The trainers. 20 BY MR. DAVIDSON: 21 Q. Do you know where the trainers kept them? 22 A. A lot of them had bags like compartment 23 bags that they would carry with them. They were in 24 charge of the meds. 25 Q. Did team doctors travel?</p>

<p style="text-align: right;">329</p> <p>1 MR. OLESON: Object to the form. 2 A. I can't. It was numerous and multiple. I 3 mean, they would pull the Toradol and all that stuff 4 and stack it in a place, a location where you could 5 get your injections. I mean, to know the number, it 6 was quite a bit. 7 BY MR. DAVIDSON: 8 Q. You testified that you personally never 9 spoke to any GMs or coaches at either the Bucs or 10 the Seahawks about medications that you were taking 11 or given; is that correct? 12 A. What was question again? Sorry. 13 Q. Sure. You had testified earlier that you 14 never spoke with any general managers or coaches at 15 either the Bucs or the Seahawks regarding the 16 medications that you were either given or taking; is 17 that correct? 18 A. You'd be skipping a chain of command -- 19 MR. OLESON: Object to the form. 20 A. -- which would be very frowned upon and 21 not good. 22 BY MR. DAVIDSON: 23 Q. Do you believe that the GMs and coaches 24 had no knowledge of the medications that were given 25 out to players to get them back on the field?</p>	<p style="text-align: right;">331</p> <p>1 this player to play today pretty much put -- and 2 you've got hours to play a football game, what else 3 are you going to do besides give medications to 4 somebody? You're not going to rehab them on a bike. 5 You're not going to miraculously rub his hands 6 together. There's nothing else to do. 7 BY MR. DAVIDSON: 8 Q. Do you know what the claims are in this 9 case? 10 A. The claims are they used drugs to benefit 11 financially by getting us to play, and hurting us 12 financially in the long-term in our work ability, 13 which hurt us financially, which I understood from 14 reading the documents is racketeering. And that the 15 NFL used their position and didn't look out for the 16 best interest of the overall health of the players. 17 Q. When you filed the disability claim, 18 Exhibit 1 was your Bert Bell/Pete Rozelle NFL Player 19 Retirement Plan application for disability benefits, 20 this was in September of 2010; is that right? 21 A. Uh-huh. 22 Q. Is that a yes? 23 A. Yes. Sorry. 24 Q. It's okay. It's late. 25 A. Yes.</p>
<p style="text-align: right;">330</p> <p>1 MR. OLESON: Object to the form. 2 A. No, they had to know because, one, Mike 3 Holmgren was the GM in Seattle, so he obviously 4 knew. 5 BY MR. DAVIDSON: 6 Q. What did he know? 7 A. He knew what was going on as far as 8 getting players to play again. He was the one 9 pushing the buttons to, hey, we need Mr. Wunsch to 10 play today. 11 Q. You don't believe that the doctors and 12 trainers of those teams were acting rogue in giving 13 medications out to players to make sure that they 14 were able to play on Sunday, do you? 15 MR. OLESON: Object to the form. 16 A. No, I do not. Sam Ramsden I know for a 17 fact never had any other job than being a trainer in 18 the NFL, so he wouldn't know any different. 19 BY MR. DAVIDSON: 20 Q. And what makes you think that coaches and 21 GMs knew that doctors and trainers were using 22 medications to get players -- get injured players on 23 the field? 24 MR. OLESON: Object to the form. 25 A. When -- what are we going to do to get</p>	<p style="text-align: right;">332</p> <p>1 Q. At that point, September 2010, when you 2 filed that, did you have any knowledge whatsoever 3 that medications that you were -- that you had been 4 taking while a player in the NFL may have caused 5 long-term damage to you? 6 MR. OLESON: Object to the form. 7 A. Well, they never said anything about it, 8 so no, I didn't. So I wouldn't have known. I mean, 9 they don't -- you know, even when I did find things 10 out, it wasn't Toradol causes Crohn's disease. It 11 was Toradol ulcerates your stomach. That doesn't 12 mean you have Crohn's disease. That doesn't mean 13 you have the GI tract issues from your throat, 14 tongue, all the way down to your butthole. 15 BY MR. DAVIDSON: 16 Q. Sure. Did you know when you filed your 17 disability claim in 2010 that the medications that 18 you were given while you were a player in the NFL 19 may have caused you to lose employment opportunities 20 as you got older? 21 MR. OLESON: Object to the form. 22 A. No, I had no idea. It was about doing 23 what I was asked to do, done, and working. I mean, I 24 didn't know anything else. So we thought that when 25 I got done, I would be able to do a job. I mean, I</p>

<p style="text-align: right;">333</p> <p>1 had dreams of having -- I wanted to be a 2 construction person and I couldn't do it. 3 BY MR. DAVIDSON: 4 Q. So are you able to work today? 5 A. No. 6 Q. At the beginning of the deposition, which 7 was a long time ago now, Mr. Oleson talked to you 8 about your injuries in high school and college. Do 9 you remember that? 10 A. Yes. 11 Q. Is there any difference between how 12 injuries were treated in -- how your injuries were 13 treated in high school and college versus how your 14 injuries were treated when you were in the NFL? 15 MR. OLESON: Object to the form. 16 A. Yes. So in high school, of course, your 17 health was always the number one thing. So they 18 would, if they thought you were injured or whatever, 19 they would pull you out. 20 In college, even if you were -- we had 21 guys like Chad Yokum, who injured his back, and some 22 other guys who they would actually give and let them 23 keep their scholarship and told them, you know, you 24 don't play football anymore. So those guys were 25 able to go and get their degree and do all that, but</p>	<p style="text-align: right;">335</p> <p>1 MR. OLESON: Object to the form. 2 A. No. 3 BY MR. DAVIDSON: 4 Q. And you're not collecting workers' comp 5 for any loss of employment opportunity? 6 MR. OLESON: Object to the form. 7 A. I don't understand -- I'm not collecting 8 anything. 9 BY MR. DAVIDSON: 10 Q. Oh, you haven't won that, you haven't even 11 settled that case. 12 A. No. We're on year -- I don't even know 13 how long, and we haven't even got a ruling yet. 14 Deny, deny until you die. 15 Q. So you're not seeking loss of employment 16 opportunities in that workers' comp case, are you? 17 A. Industrial disease. 18 What's funny through the whole workers' 19 comp claim and all the workers' comp stuff that 20 we've gone through, in learning this whole thing, I 21 don't understand how OSHA cannot be involved in a 22 business where drugs are given out and players are 23 put on a field and made to run into each other. I 24 don't understand how OSHA is not involved. That 25 boggles my mind.</p>
<p style="text-align: right;">334</p> <p>1 football -- they told them, you shouldn't do this 2 anymore. And that was the difference. 3 BY MR. DAVIDSON: 4 Q. How is it different in the NFL? 5 A. NFL was about week to week, winning 6 football games and short-term and whatever it took 7 to win football games. 8 Q. And what did it take to win football 9 games? 10 MR. OLESON: Object to the form. 11 A. I mean, drugs, mind games, threats of 12 losing your job, all that stuff. 13 Can I say something? 14 MR. DAVIDSON: No. 15 THE WITNESS: Okay. 16 MR. DAVIDSON: It's just not how it works. 17 THE WITNESS: Okay. 18 BY MR. DAVIDSON: 19 Q. In the workers' comp case you filed in 20 California and then you went to Washington, do you 21 remember talking about those with Mr. Oleson? 22 A. Yes. 23 Q. Did those workers' comp claims have 24 anything to do with the injuries that you may have 25 suffered due to medications that you were given?</p>	<p style="text-align: right;">336</p> <p>1 MR. DAVIDSON: Nate is smarter than all of 2 us. Maybe he can explain it to us. 3 I don't have any further questions. 4 MR. OLESON: I have some recross. 5 REDIRECT EXAMINATION 6 BY MR. OLESON: 7 Q. Mr. Wunsch, I just want to make sure I 8 understand your testimony correctly. For the 9 California workers' comp claim, you're not seeking 10 any recovery in this case for any injury described 11 in your California workers' comp application? 12 MR. DAVIDSON: Objection. 13 A. I don't understand the question. 14 BY MR. OLESON: 15 Q. Sure. In response to your counsel's 16 questions, you said you weren't seeking recovery for 17 the workers' comp, California workers' comp claims 18 in this case? 19 A. This has nothing to do with the workers' 20 comp. 21 Q. Sure. The injuries that you describe in 22 your California workers' comp application, are you 23 seeking recovery for those injuries in this case? 24 A. No. The workers' comp case is being done 25 in Seattle. This has to do with the use of the</p>